

EXHIBIT B

SHOOK
HARDY & BACON

January 10, 2025

BY ELECTRONIC MAIL

William A. Levin
Levin Simes LLP
1700 Montgomery St., Suite 250
San Francisco, CA 94111
wlevin@levinsimes.com

Walt Cubberly
Williams Hart Boundas, LLP
8441 Gulf Freeway, Suite 600
Houston, Texas 77017
wcubberly@whlaw.com

Steve Estey
Estey Bomberger
2869 India Street
San Diego, CA 92103
steve@estey-bomberger.com

Celine Cutter
Cutter Law P.C.
1999 Harrison Street, Suite 1400
Oakland, CA 94612
ccutter@cutterlaw.com

Sarah R. London
Lieff Cabraser Heimann &
Bernstein
275 Battery Street, Fl. 29
San Francisco, CA 94111
Slondon@lchb.com

Rachel B. Abrams
Peiffer Wolf Carr Kane Conway &
Wise, LLP
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Rabrams@peifferwolf.com

Roopal P. Luhana, Esq.
Chaffin Luhana LLP
600 Third Avenue, F. 12
New York, NY 10016
Luhana@chaffinluhana.com

***Co-Lead Counsel for MDL
Plaintiffs***

***Co-Lead Counsel for JCCP
Plaintiffs***

Re: *In Re: Uber Rideshare Cases*, JCCP No. 5188; and *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*, MDL 3084

Dear Counsel:

On behalf of our clients, Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”), we are producing documents for which Defendants no longer assert a claim of privilege or produce now with privilege redactions from Uber’s privilege log dated December 3, 2024, pursuant to the Order Regarding First Set of Challenges to Uber’s Privilege Claims entered by the Court on November 27, 2024 the Order Regarding Second Set of Challenges to Uber’s Privilege Claims entered by the Court on December 21, 2024, and the

Michael B. Shortnacy
2121 Avenue of the Stars
Suite 1400
Los Angeles, California 90067
t 424.285.8330
dd 424.324.3494
f 424.204.9093
mshortnacy@shb.com

Order Regarding Time to Produce De-Designated Documents entered by the Court on December 16, 2024.

Defendants do so in the spirit of cooperation, narrowing disputes, conserving judicial resources, and without subject matter waiver. The first production volume contains replacement images and load files for documents previously produced as slipsheets or with privilege redactions. The second production volume contains documents produced in the first instance. Bates labels and corresponding privilege log details are provided in the chart below.

January 10, 2025
Page 2

Please note that documents in this production have been labeled as “CONFIDENTIAL” and “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” consistent with the JCCP Protective Order entered by the Court on September 14, 2022 and the MDL Protective Order entered by the Court on December 28, 2023. The designated materials shall be handled and stored in accordance with these Orders of the Court.

JCCP_MDL Priv No.	Bates Range	Vol
JCCP_MDL_PRIVLOG039356	UBER_JCCP_MDL_000535015 - UBER_JCCP_MDL_000535015	67
JCCP_MDL_PRIVLOG057572	UBER_JCCP_MDL_001712114 - UBER_JCCP_MDL_001712114	67
JCCP_MDL_PRIVLOG026221	UBER_JCCP_MDL_002266831 - UBER_JCCP_MDL_002266831	68
JCCP_MDL_PRIVLOG026377	UBER_JCCP_MDL_002266832 - UBER_JCCP_MDL_002266834	68
JCCP_MDL_PRIVLOG032008	UBER_JCCP_MDL_002266835 - UBER_JCCP_MDL_002266838	68
JCCP_MDL_PRIVLOG026992	UBER_JCCP_MDL_002266839 - UBER_JCCP_MDL_002266841	68
JCCP_MDL_PRIVLOG027325	UBER_JCCP_MDL_002266842 - UBER_JCCP_MDL_002266860	68
JCCP_MDL_PRIVLOG033266	UBER_JCCP_MDL_002266861 - UBER_JCCP_MDL_002266864	68
JCCP_MDL_PRIVLOG033301	UBER_JCCP_MDL_002266865 - UBER_JCCP_MDL_002266865	68
JCCP_MDL_PRIVLOG028244	UBER_JCCP_MDL_002266866 - UBER_JCCP_MDL_002266867	68
JCCP_MDL_PRIVLOG034892	UBER_JCCP_MDL_002266868 - UBER_JCCP_MDL_002266870	68
JCCP_MDL_PRIVLOG034998	UBER_JCCP_MDL_002266871 - UBER_JCCP_MDL_002266872	68
JCCP_MDL_PRIVLOG038185	UBER_JCCP_MDL_002266873 - UBER_JCCP_MDL_002266880	68

January 10, 2025
 Page 3

JCCP_MDL_PRIVLOG044017	UBER_JCCP_MDL_002266881 - UBER_JCCP_MDL_002266886	68
JCCP_MDL_PRIVLOG044456	UBER_JCCP_MDL_002266887 - UBER_JCCP_MDL_002266887	68
JCCP_MDL_PRIVLOG045031	UBER_JCCP_MDL_002266888 - UBER_JCCP_MDL_002266888	68
JCCP_MDL_PRIVLOG045140	UBER_JCCP_MDL_002266889 - UBER_JCCP_MDL_002266889	68
JCCP_MDL_PRIVLOG048052	UBER_JCCP_MDL_002266890 - UBER_JCCP_MDL_002266890	68
JCCP_MDL_PRIVLOG052575	UBER_JCCP_MDL_002266891 - UBER_JCCP_MDL_002266891	68
JCCP_MDL_PRIVLOG052825	UBER_JCCP_MDL_002266892 - UBER_JCCP_MDL_002266895	68
JCCP_MDL_PRIVLOG056807	UBER_JCCP_MDL_002266896 - UBER_JCCP_MDL_002266898	68
JCCP_MDL_PRIVLOG057556	UBER_JCCP_MDL_002266899 - UBER_JCCP_MDL_002266917	68

Per the agreement of the parties in the JCCP and MDL, Uber is making a single production in both actions, with the Bates prefix of UBER_JCCP_MDL.

You can access these documents at the following FTP link: <https://ftp/lhediscovery.com/>. The passwords for the zip files on the FTP site will be forwarded by separate email.

Production of these materials is not intended to, and does not, waive any applicable privilege or other legal basis under which information may be protected from disclosure. If it were found that provision of this material constitutes production of otherwise privileged matters, such disclosure would be inadvertent, and is not intended to, and does not, waive any attorney-client privilege, work-product, or other protection that the producing party would otherwise be entitled to assert with respect to the inadvertently produced material and its subject matter.

Uber reserves the right to amend, supplement, correct, or modify the information contained herein and in the associated documents, if and as we obtain additional information.

SHOOK
HARDY & BACON

Sincerely,



January 10, 2025
Page 4

Michael B. Shortnacy
Partner

cc:

Robert A. Atkins
Patrick L. Oot
Bobbie E. Hooper
Kyle Smith
Jessica E. Phillips
Randall S. Luskey
Jacqueline P. Rubin
Christine M. Ray

*Counsel for Defendants
Uber Technologies, Inc., Rasier LLC, and Rasier-CA LLC*